

March 29, 2005

Phil Isenberg, Chair  
State MLPAL Blue Ribbon Task Force  
1416 Ninth Street, Suite 1311  
Sacramento, CA 95814

Dear Chairman Isenberg:

Thank you for allowing another opportunity to comment on the second revision of the Master Plan Framework as prepared by Task Force Staff. I have attached the City of Monterey's comment letter to the first Draft of the Master Plan Framework, as adopted by the City Council, and I refer to that letter for this comment.

Regarding our concern that the public's safety be given a high priority in this guidance document, it appears that the current revision only obliquely references this point. I believe that the Framework must clearly make a priority out of public safety concerns when considering the site placement of MPAs. This kind of critical guidance goes to the heart about what the Framework should be about.

Regarding our concern that a full socioeconomic assessment be done of both the individual MPA sites and as a network, again, there is only oblique reference to this in the revised document. There needs to be a clear statement about what socioeconomic analysis will be done, how it will be peer-reviewed, and most importantly, how that information will be valued in the decision-making process. I hope that it is given great value, particularly when there are competing alternatives, and the socioeconomic evaluation could well tell the decision makers which alternative can accomplish the goals of the MLPA, but with the least social and economic cost. The Master Plan Framework must clearly deal with this topic.

Regarding the potential negative effects of MPAs, there is new language in the document that begins to address this point, and the work of Dr. Ray Hillborn is now referenced. One of the most significant negative effects of MPAs is the fact of displaced fishing effort. This is now mentioned in the framework. The City recommends that the Framework fully develop this discussion, and offer guidance as to how the issue of displaced fishing effort will be resolved in MPA site selection.

Regarding our concern about highly protected areas adjoining highly urbanized areas, and even more specifically, addressing the fact that the Monterey City limits actually extend out to ten fathoms of water - there is very little discussion in

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the revised Framework despite our prior comments and concerns on this topic. The City of Monterey supports the general goals of the process, while we are at the same time concerned that the implementation of these goals may produce situations, intended or unintended by the State, that are of grave consequence.

Currently the City is working with state regulators and environmental organizations to come up with agreeable solutions to the now prohibited discharge of stormwater into Areas of Special Biological Significance. The prohibition was the "unintended consequence" of several layers of regulatory changes, and now threatens to bankrupt local governments up and down the coast. Indications are that moving the discharges to another point along the coast could actually be an environmental disbenefit. This is one example of the socio-economic impact of rulemaking that must be clearly understood when creating new layers of protection.

We heard several community members comment at the February 2005 Blue Ribbon Task Force meetings in Monterey about the need to address the land-sea connection through this process. The central coast region is especially aware of this connection and wish the Task Force to recognize that discharges from land are already heavily regulated in urbanized areas under the regulatory authority of the Central Coast Regional Water quality Control Board. Several local efforts related to this land-sea connection are already underway, and any recognition of this issue within the MLPA process should recognize that those regulatory authorities do already exist.

Since this will be a statewide guidance document, these questions of the State's relationship to coastal communities and the wisdom of placing highly protected areas in the vicinity of storm water runoff from urbanized areas is one which must be addressed with a guidance statement. Hopefully, the guidance statement will be acceptable to coastal communities.

Finally, the City previously commented that the Draft Framework appears to be much too long; it must be readily understandable by those who read it and will use it. This comment is still true, and in particular, we see little value in the lengthy Introduction section found on pages 4-14. The Framework could be simplified and yet still serve its guidance role if this section was removed entirely.

Thank you for considering these thoughts.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dan Albert".

Dan Albert  
Mayor